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**From:** Hambrick, Amy [Hambrick.Amy@epa.gov]  
**Sent:** 9/6/2019 2:50:55 PM  
**To:** Marsh, Karen [Marsh.Karen@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]  
**Subject:** RE: OOOOa Reporting Deadline

Hi Karen – The questions I've responded to are in regards to the reporting template. Below is an example of the type of response I've used.

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EXAMPLE:

The reporting template is not yet finalized. Please note, while the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website is still considered "draft", the requirement to submit only through CEDRI is not triggered, however during this time it seems most people are finding it easier to submit to CEDRI anyway. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, EPA just proposed reconsideration amendments to OOOOa (here: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source>) and along with these proposed changes EPA has updated the draft reporting template (see "announcements" on the CEDRI website here: <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) . EPA is taking public comments until December 17, 2018 so please be sure to submit your comments on the reporting template and proposed amendments, the FR notice has instructions for how to comment.

I hope this is helpful,

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For the question Mili asks, I think we have said facilities can work to get multiple units on the same reporting schedule. Below was a response we've used for a common reporting schedule (I think the question was to have a common schedule for OOOO and OOOOa facilities but I think it can be tailored for Mili's question).

“Subpart OOOO covers affected facilities that commence construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015. Subpart OOOOa covers affected facilities that commence construction, modification or reconstruction after September 18, 2015. It will probably be useful to refer to §60.5420a(b) in Subpart OOOOa. A common schedule may arrange with the Administrator on which reports required under part 60 may be submitted as long as the schedule does not extend the reporting period.”

Also I regards to the title V question, here is a response we’ve used :

“Multiple affected facilities may be combined into one annual report and multiple annual reports may be submitted on a common schedule as permitted under §60.5420a(b):

(b) *Reporting requirements.* You must submit annual reports containing the information specified in paragraphs (b)(1) through (8) and (12) of this section and performance test reports as specified in paragraph (b)(9) or (10) of this section, if applicable. You must submit annual reports following the procedure specified in paragraph (b)(11) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to §60.5410a. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (8) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.”

My take away, they should work with the delegated authority to determine the common schedule and verify it doesn’t extend the reporting period. Based on the dates she suggests it looks to me like the reporting period would be extended. For the A. group below the first part of the report period would be missed (10/17 – 8/2/18) and for B. group the later months 8/2/19 to 12/27/19 would be missed. But maybe those are last years facilities that already reported? I could be misreading the email.... I don’t think what she suggests is unreasonable, but the delegated authority would need to help figure out the report period for the set of units she is talking about. At a minimum I think we could help her simplify it down to a couple of batches instead of separate reports for each unit. I hope this is making sense. Happy to talk more.

“The initial compliance period begins on August 2, 2016, or upon initial startup, whichever is later, and ends no later than 1 year after the initial startup date for your affected facility or no later than 1 year after August 2, 2016”

A. 10/16/17 to 10/16/18 = report period

B. 12/27/18 to 12/27/19 = report period

**Suggesting 8/2/18 to 8/2/19 = report period**

Amy

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**From:** Marsh, Karen <Marsh.Karen@epa.gov>  
**Sent:** Friday, September 06, 2019 10:21 AM  
**To:** Hambrick, Amy <Hambrick.Amy@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>  
**Subject:** FW: OOOOa Reporting Deadline

Amy,

I think you may have been handling reporting questions after Lisa left on her detail, so I wanted to check with you before responding. Is this a question we've responded to before?

I'm not sure on the last question. That may be something they need to address with the delegated authority.

Karen

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Karen R. Marsh, PE  
US EPA, OAQPS, Sectors Policies and Programs Division  
Fuels and Incineration Group  
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**From:** Mili Patel <[mili\\_patel@tcenergy.com](mailto:mili_patel@tcenergy.com)>  
**Sent:** Thursday, September 05, 2019 2:39 PM  
**To:** Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>  
**Subject:** OOOOa Reporting Deadline

Karen –

I wanted to follow up with you regarding the annual reporting deadline for OOOOa. As I understand it, the compliance period is

"The initial compliance period begins on August 2, 2016, or upon initial startup, whichever is later, and ends no later than 1 year after the initial startup date for your affected facility or no later than 1 year after August 2, 2016"

We have several new OOOOa that started from between 10/16/17 and 12/27/18. Last years reporting we utilized the start up dates to determine the report deadline. Now with so many more units that started up I want to try and simplify that. I wanted to see if it was acceptable to use the August 2<sup>nd</sup> compliance period from the rule and have all of our reports due by 10/31 each year. If we use this logic our reporting period is 8/2/18 – 8/2/19 with reports due 10/31/19.

Another question is can we include the OOOOa with our Title V Annual Compliance Reports instead of separately?

Thanks.

Mili Patel  
US Environment – Air Compliance  
Environment, Land & Indigenous Relations (EL&IR)

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**From:** Andrew Woerner <[Andrew.Woerner@erm.com](mailto:Andrew.Woerner@erm.com)>  
**Sent:** Thursday, September 5, 2019 1:17 PM  
**To:** Mili Patel <[mili\\_patel@tcenergy.com](mailto:mili_patel@tcenergy.com)>  
**Cc:** Grant Morgan <[Grant.Morgan@erm.com](mailto:Grant.Morgan@erm.com)>  
**Subject:** [EXTERNAL] Karen Marsh Contact Information

Hi Mili –

Good to connect today..

Karen Marsh is the current lead for OOOOa ( reconsideration process) at EPA. She can probably confirm our discussion about reporting timelines under the rule and / or direct you appropriately.

Her contact information is below:

Karen R. Marsh, PE  
US EPA, OAQPS, Sectors Policies and Programs Division  
Fuels and Incineration Group  
109 TW Alexander Drive, Mail Code E143-05  
Research Triangle Park, NC 27711  
Direct: (919) 541-1065; email: [marsh.karen@epa.gov](mailto:marsh.karen@epa.gov)

You can also have a look at Section 1.4.3 of this EPA guidance document on the rule...

<https://www.epa.gov/sites/production/files/2016-08/documents/2016-compliance-guide-oil-natural-gas-emissions.pdf>

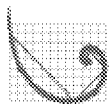
I think it's pretty clear that you are able to cluster reports so long as you don't have a site go past its own "initial compliance period", which you would not if you are sweeping up everything annually.

Thanks,

Andy Woerner  
**Partner**

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